

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: **JAN 06 1993**

SUBJECT: Dayco/L.E. Carpenter Site
Final Feasibility Study Report (November 1992)

FROM: John Filippelli, Chief
Environmental Analysis Section *J. Filippelli*

TO: Pat Evangelista, Chief
Northern New Jersey Superfund Section II

We have reviewed the Final Feasibility Study Report for the L.E. Carpenter site for issues related to environmental resources, and offer the following comments:

o **Wetlands Assessment and Floodplains Delineation Reports**

Our October 15, 1992 comment memo raised concerns about the wetland and floodplains reports for the site. The issue regarding the floodplains report and apparent inconsistencies in floodplain elevations was resolved during an October 15, 1992 telephone conversation between Susan Osofsky of my staff, and Christina Purcell, RPM for the New Jersey Department of Environmental Protection and Energy. However, our comments concerning the wetlands report have not yet been addressed. We look forward to resolution of the outstanding issues regarding sampling data, acreage estimates, mitigation measures, delineation timing, wetland dewatering, etc.

o **Alternative 3, Compliance with ARARs
Section 6.2.3.2.**

1. Executive Order 11990 (Protection of Wetlands) and the EPA "Statement of Policy on Floodplains and Wetlands for CERCLA Action" require that remedial action alternatives be evaluated for how they may potentially impact wetland areas. Drawdown of the water table in the wetlands and siltation resulting from the trenching operations are potential impacts that must be considered if EPA is to comply with these TBCs.
2. This section should discuss the type of measures planned to minimize siltation and sediment loading.
3. Hot spot removal and trench installation may also impact areas sensitive for cultural resources, as discussed on page 2-19. Accordingly, the National Historic Preservation Act (NHPA) should be listed as an ARAR. A stage IB cultural resources survey will be required for areas sensitive for the discovery of cultural resources identified in the stage IA survey report.



o **Alternative 4, Compliance With ARARs**
Section 6.2.4.2.

1. Same as comment 1 under Alternative 3.
2. Same as comment 2 under Alternative 3.
3. Same as comment 3 under Alternative 3.

o **Alternative 5, Compliance with ARARs**
Section 6.2.5.2.

1. This section should discuss the type of mitigation being considered for wetland areas that may be excavated.
2. Same as comment 2 under Alternative 3.
3. Soil washing may impact areas sensitive for discovery of cultural resources. The NHPA is an ARAR for this remedy. As noted in comment 3 under Alternative 3, a Stage IB cultural resources survey is required for these sensitive areas.

o **Alternative 6, Compliance with ARARs**
Section 6.2.6.2.

1. Same as comment 1 under Alternative 3.
2. Same as comment 2 under Alternative 3.
3. Same as comment 1 under Alternative 5.
4. Excavation of soil for incineration may impact areas sensitive for discovery of cultural resources. The NHPA is an ARAR for this remedy. As noted in comment 3 under Alternative 3, a Stage IB cultural resources survey is required for these sensitive areas.

Thank you for this opportunity to comment. If you have any questions concerning these comments or the information we have requested, please have Susan Osofsky contacted at x6677.

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